



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



285113

September 27, 2005

REPLY TO THE ATTENTION OF:

VIA FEDERAL EXPRESS

RETURN RECEIPT REQUESTED

RRG Clayton Chemical Site (soil
removal)

R K Howie Jr., President
The Grigoleit Company
2000 Woodford St.
Decatur, IL 62526

RE: Clayton Chemical Site General Notice of Potential Liability
letter.

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site, and is planning to spend public funds to control and investigate these releases. This action will be taken by U.S. EPA pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. 9601 et seq., (CERCLA) as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. No. 99-499, stat. 1613 (1986) (SARA), unless U.S. EPA determines that such action will be done properly by a responsible party. Responsible parties under CERCLA include the current and former owners and operators, and persons who generated the hazardous substances or were involved in transport, treatment, or disposal of them at the Site. Under Section 107(a) of CERCLA, where the Agency uses public funds to achieve the cleanup of the hazardous substances, responsible parties are liable for all costs associated with the removal or remedial action and all other necessary costs incurred in cleaning up the Site, including investigation, planning and enforcement.

The U.S. EPA is currently planning to conduct the following actions at the above referenced Site:

1. Develop and implement a site health and safety plan;
2. Provide security for the site;
3. Sample, characterize, and consolidate for removal and disposal

material found on-site;

4. Transport and dispose of all characterized hazardous substances, pollutants, wastes, or contaminants at a RCRA approved disposal facility in accordance with the U.S. EPA Off-Site Rule, 40 CFR 300.440.

5. Backfill the excavated site areas with clean material and topsoil. Restore and vegetate excavated areas to prevent soil erosion.

U.S. EPA has received information that you may be a potentially responsible party (PRP) at this Site. The information used by U.S. EPA in part to make this determination was provided by the group of PRPs that conducted the initial liquids removal action at this Site. The report used by U. S. EPA titled "The RRG/Clayton Liquids Removal, Investigation Report" included a volumetric ranking of PRPs that may have sent liquids, solids and or other material to be processed at the Site. Based on U.S. EPA's review and analysis of the volumetric ranking in that report; the Agency has initially notified all PRPs that sent or contributed 75,000 gallons or more to the Site that they are PRPs. This group consists of 72 of the approximate 2,800 PRPs that sent material to this Site to be processed. However, U.S. EPA calculations indicate that the initial group of 72 PRPs contributed over 72% of the wastes processed at the Site.

The Agency's decision to initially only notice the 72 largest PRPs at this Site is based on a number of factors. First, U. S. EPA wants to begin a removal action at this Site as soon as possible and having a limited number of PRPs in the group will make this possible. Second, EPA believes that having the small initial group of 72 PRPs will make it easier for them to come to agreement and decisions on the many actions that need to be made during the course of the Site clean up. Finally, U. S. EPA plans to notice additional PRPs identified in the aforementioned report.

The initial group of 72 PRPs were issued a General Notice of Liability letter by the Agency in November of 2004. A list of the 72 PRPs that were previously notified by the Agency is attached for your information and review. You are receiving this notice because the Agency further analyzed the volumetric ranking and found that your company also contributed 75,000 gallons or more to the Site.

By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a PRP, to reimburse U.S. EPA for costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

As a potentially responsible party, you should notify U.S. EPA in writing within ten (10) days after receipt of this letter, regarding your willingness to perform or finance the activities described above. If U.S. EPA does not receive a timely response, U.S. EPA will assume that you or your organization does not wish to negotiate a resolution of its potential responsibility in connection with the Site and that you or your organization has declined any involvement in performing the response activities.

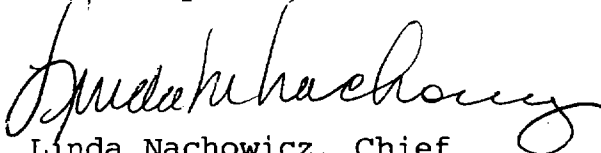
Your letter should indicate the appropriate name, address, and telephone number for further contact with you. If you are already involved in discussions with state or local authorities, engaged in voluntary cleanup action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to report the status of those discussions or actions in your response to this letter and to provide a copy of your response to any other parties involved in those discussions or actions. Your response should be sent to:

Tom Turner
Associate Regional Counsel
U.S. EPA - Region V
Office of Regional Counsel (C-14J)
77 W. Jackson Boulevard
Chicago, Illinois 60604

If you need further information regarding this letter, you may contact Tom Turner of the Office of Regional Counsel at, (312) 886-6613.

Due to the nature of the problem at this site and the attendant legal ramifications, U.S. EPA strongly encourages you to submit a written response within the time frame specified herein. We hope you will give this matter your immediate attention.

Sincerely,



Linda Nachowicz, Chief
Emergency Response Branch

Attachment: A-General Notice PRP list.

ATTACHMENT A

List Of Potential Responsible Parties Receiving a General notice Letter

RRG/CLAYTON CHEMICAL COMPANY
RRG/Clayton Chemical Company
c/o Sheldon D. Korlin, Esq.
P.O. Box 1286
Alton, IL 62002-1286

DENNIS BALLINGER REAL ESTATE
Dennis Ballinger Real Estate
119 W. William St., Suite 300
Decatur, IL 62523-1185

NASCOTE INDUSTRIES, INC.
Margaret A. Coughlin Esq.
Dickinson Wright, PLLC
38525 Woodward Ave.
Bloomfield Hills, MI 48304-2970

FORD MOTOR COMPANY
Sir Nicholas V. Scheele, President
Ford Motor Company
One American Road
Dearborn, MI 48126

SIGMA-ALDRICH CORPORATION
Mr. Jai Nagarkatti, President
Sigma-Aldrich Corporation
3050 Spruce Street
St. Louis, MO 63103

MALLINCKRODT INC.
Mr. Peter S. Strassner,
Thompson Coburn LLP
One US Bank Plaza
St. Louis, MO 63101-1693

BLISS WASTE OIL COMPANY
Mr. Jerry Bliss, Owner
Bliss Waste Oil Company
149 Strecker Road
Ballwin, MO 63011

A-1 OIL CORPORATION
Mr. Jerry Bliss, Registered Agent
A-1 Oil Corporation
149 Strecker Road
Ballwin, MO 63011

DAIMLERCHRYSLER CORPORATION
Mary Ericson Waters,
Daimler-Chrysler Corporation
1000 Chrysler Drive
Auburn Hills, MI 48326-2766

LEAR CORPORATION
Mr. David W. Nunn
Eastman & Smith Ltd.
One SeaGate, 24th Floor
Toledo, OH 43699

U.S. PAINT CORPORATION
Mr. John Duchardt, President
U.S. Paint Corporation
831 South 21st Street
St. Louis, MO 63103

STERLING LACQUER MANUFACTURING COMPANY
Mr. Leo V. Mitchell, President
Sterling Lacquer Manufacturing Company
3150 Brannon Ave.
St. Louis, MO 63139

SUPERIOR EQUIPMENT COMPANY, INCORPORATED
Bruce A. Morrison Esq.
Green, Hennings & Henry, LLP
705 Olive Street
St. Louis, MO 63101-2208

THE SWAN CORPORATION
Greensfelder, Hemker & Gale, P.C.
2000 Equitable Building
St. Louis, MO 63102-1774

PLASTIC PRODUCTS CO., INC.
Ms. Marlene Messin, President
Plastic Products Co., Inc.
30355 Akerson Street
Lindstrom, MN 55045

UOP LLC
Mr. Carlos Guimaraes, President
UOP LLC
25 East Algonquin Road
Des Plaines, IL 60016

NATIONAL COATINGS INC
Mr. James Hillhouse, President
National Coatings, Inc.
604 US Highway 160 East
Galesburg, IL 61401

CERRO FLOW PRODUCTS, INC.
Richard F. Ricci Esq.
Lowenstein Sandler PC
65 Livingston Avenue
Roseland, NJ 07068-1791

NORTH EAST RECYCLING TRANSPORTATION, INC.
James P. Oliver Esq., Registered Agent
Squire, Sanders & Dempsey L.L.P.
for North East Recycling Transportation, Inc.
Cleveland, OH 44114

OLIN CORPORATION
Ms. Lorraine M. Miller
Principal Environmental Specialist
Olin Corporation
1186 Lower River Road NW
Charleston, TN 37310

MONSANTO COMPANY
Mr. Hugh Grant, President
Monsanto Company
800 N. Lindbergh Blvd.
St. Louis, MO 63167

HUSSMAN CORPORATION
Ms. Donna K. Bryant McMahon
Hussman Corporation
155 Chestnut Ridge Rd.
Montrale, NJ 07645

SEQUA CORPORATION
Mr. Jon Santangelo
Stinson Morrison Hecker
100 South Fourth, Suite 700
St. Louis, MO 63102

BOBEN MANUFACTURING COMPANY
Mr. Robert H. Slosberg, Registered Agent
Boben Manufacturing Company
11 Nantucket Ln.
St. Louis, MO 63132

AAD DISTRIBUTION & DRY CLEANING SERVICES,
INC.
Mr. Hormoz Pourat c/o Ms. Paula Silverbush Pourat
for AAD Distribution and Dry Cleaning Services, Inc.
5107 Enfield Avenue
Encino, CA 91316

TEVA PHARMACEUTICALS USA, INC.
Gail S. Port Esq.
Proskauer Rose, LLP
1585 Broadway
New York, NY 10036

DIOSYNTH, INC.
Robin Hall
Akzo Nobel, Inc.
525 W. Van Buren Street
Chicago, IL 60607

COLEMAN CHEMICAL, INC.
Mr. Albert R. Puntureri, President
Coleman Chemical, Inc.
75 Sanger St.
Peoria, IL 61602

NORFOLK SOUTHERN RAILWAY COMPANY
Mr. Charles W. Moorman, President
Norfolk Southern Railway Company
3 Commercial Place
Norfolk, VA 23510

MCINTYRE GROUP, LTD.
Eric E. Boyd Esq.
Seyfarth Shaw LLP
55 E. Monroe St.
Chicago, IL 60603

EXXONMOBIL OIL CORPORATION
Mr. Rex W. Tillerson, President
ExxonMobil Oil Corporation
5959 Las Colinas Blvd.
Irving, TX 75039-2298

CHICAGO DRUM, INC.
Mr. Buddy Ross, President
Chicago Drum, Inc.
6829 Flintlock Road
Houston, TX 77040

UNIVERSAL PACKAGING CORPORATION
Ms. Gloria Cobb, President
Universal Packaging Corporation
4761 Moline Street
Denver, CO 80239

WALKER PADUCAH CORP.
Ms. Tara R. Ertischek, Corporate Counsel
Walker Paducah Corp.
4400 Harding Road
Nashville, TN 37205

SAFETY-KLEEN SYSTEMS, INC.
Frederick J. Florjancic Jr., President & CEO
Safety-Kleen Systems, Inc.
5400 Legacy Dr.
Plano, TX 75024

TNEMEC COMPANY, INC.
Mr. Andrew J. Bailey
Blackwell Sanders Peper Martin LLP
4801 Main St., Suite 1000
Kansas City, MO 64112

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY
Mr. Gary L. Rainwater, President
Central Illinois Public Service Company
One Ameren Plaza
St. Louis, MO 66149

LYON METAL PRODUCTS, L.L.C.
Patrick M. Kinnally Esq.
Kinnally, Krentz, Loran, Hodge & Herman, P.C.
for Lyon Metal Products LLC
P.O. Box 5030
Aurora, IL 60507-5030

RILEY BROTHERS COMPANY
Mr. James S. Jennison, President
Jennison Industries, Inc.
for Riley Brothers Company
106 Washington Avenue
Burlington, IA 56201

TITAN WHEEL CORPORATION OF ILLINOIS
Mr. Ronald B. Schildt, President
Titan Wheel Corporation of Illinois
2701 Spruce Street
Quincy, IL 62301

SILGAN CONTAINERS CORPORATION
Mr. Dennis Cornish
Director, Environmental Services
Silgan Containers Corporation
21800 Oxnard St., Suite 600
Woodland Hills, CA 91367

INX INTERNATIONAL INK COMPANY
Mr. Richard Clendenning, President
INX International Ink Co.
651 Bonnie Lane
Elk Grove Village, IL 60007

KEYSTONE CONSOLIDATED INDUSTRIES, INC.

Mr. David Cheek, President
Keystone Consolidated Industries, Inc.
dba Keystone Steel & Wire Company
7000 SW Adams Street
Peoria, IL 61641

AFTON CHEMICAL CORPORATION

Ms. Ann T. Burks, Assistant Counsel
New Market Services Corp.
330 South Fourth Street
Richmond, VA 23219

BEMIS COMPANY, INC.

Mr. Jeffrey Curler, President
Bemis Company, Inc.
222 S. 9th St.
Minneapolis, MN 55402

STEELCOTE MANUFACTURING COMPANY

Mr. John Milner, President
Steelcote Manufacturing Company
One Steelcote Square
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BAKER PETROLITE CORPORATION

Ms. Halina E. Caravello
Baker Petrolite Corporation
12645 West Airport Blvd.
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IMPERIAL HOME DECOR GROUP, INC.

Mr. Douglas R. Kelly, President
Imperial Home Decor Group, Inc.
23645 Mercatile Rd.
Cleveland, OH 44122

DON V. DAVIS COMPANY

Ms. Ophelia Davis, Owner
Don V. Davis Company
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St. Louis, MO 63147

PENN ALUMINUM INTERNATIONAL, INC.

John Nichols
Penn Aluminum International, Inc.
1117 North 2nd St.
Murphysboro, IL 62966

KOCH INDUSTRIES, INC.

Mr. Christopher R. Graham, Senior Counsel
Koch Industries, Inc.
4111 E. 37th St. North
Wichita, KS 67720

VALENTEC WELLS, LLC

President
Valentec Wells, LLC
Lake City Army Ammunition Depot, Bldg. 2
Independence, MO 64051

AMERICAN RECREATION PRODUCTS, INC.

Mr. Jon Santangelo
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CHEMISPHERE CORPORATION

Mr. Robert F. Schwent, President
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St. Louis, MO 63139

MARCHEM CORPORATION

Ms. Penni Livingston
Marchem Corporation
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CURWOOD, INC.

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Curwood, Inc.
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Oshkosh, WI 54903

THE KANSAS CITY SOUTHERN RAILWAY COMPANY
Mr. Michael Haverty, President
The Kansas City Southern Railway Company
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SAFETY-KLEEN (TS), INC.
Mr. David M. Sprinkle, President
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THE DOW CHEMICAL COMPANY
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One IBM Plaza
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LYON WORKSPACE PRODUCTS, LLC
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Lyon Workspace Products, LLC
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METAL CONTAINER CORPORATION
Mr. Joseph P. Sellinger, President
Metal Container Corporation
One Busch Place
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CROWN BEVERAGE PACKAGING, INC.
Mr. Robert J. Truitt, President
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One Crown Way
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DJR HOLDINGS, INC.
Mr. Rodney D. Jarboe, President
DJR Holdings, Inc.
1019 Skinker Parkway
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ARRIS INTERNATIONAL, INC.
Mr. Gaines P. Carter
Arris International, Inc.
3871 Lakefield Dr.
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MITSUBISHI MOTORS NORTH AMERICA, INC.
Mr. Pierre M. Gagnon, President
Mitsubishi Motors North America, Inc.
6400 Katella Ave.
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SUPERIOR OIL CO., INC.
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ALLIED HEALTHCARE PRODUCTS, INC.
Ms. Christina Archer
Greensfelder Hemker & Gale
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CONOPCO, INC.
Mr. Charles B. Strauss, President
Conopco, Inc.
700 Sylvan Ave.
Englewood Cliffs, NJ 07632

LINCOLN INDUSTRIAL CORPORATION
Mr. Mark T. Schroepfer, President
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Mr. Paul B. Mulhollem, President

Archer-Daniels-Midland Company

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(Mailed September 2005)

ILLINOIS CENTRAL RAILROAD COMPANY

Mr. E. Hunter Harrison, President

Illinois Central Railroad Company

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(Mailed September 2005)